

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 19-CV-11416 (WGY)
	)	
HENRY B. SARGENT,	)	
FREDERICK M. MINTZ,	)	
ALAN P. FRAADE,	)	
JOSEPH J. TOMASEK and	)	
PATRICK GIORDANO,	)	
	)	
Defendants.	)	
_____	)	

**Joint Motion for Extension of All Deadlines for a Period of Ninety Days**

Plaintiff Securities and Exchange Commission (the “Commission”) and defendants Henry B. Sargent, Frederick M. Mintz, Alan P. Fraade, Joseph J. Tomasek, and Patrick Giordano (collectively, the “Defendants”) submit this Joint Motion for extension of the fact discovery deadline for purposes of depositions only (now presently June 12, 2020) and other subsequent deadlines including expert discovery deadlines (August 7, 2020) and for the case to be tried (November 2020) for ninety days. Given the present coronavirus pandemic and the need to take multiple depositions requiring travel and numerous individuals congregating in conference room, the parties agree that a ninety day delay is appropriate.

However, the parties agree that non-deposition discovery and motion practice as related to that discovery can continue to take place during this time and that the June 12, 2020 deadline should remain in effect for that discovery and motion practice.

The parties therefore propose the following schedule going forward:

Fact Discovery Cutoff (Documents and Motion Practice)	June 12, 2020
Fact Discovery Deadline (Depositions)	September 10, 2020
SEC Opening Expert Report(s) Due	September 24, 2020
Defendants Opening Expert Report(s) Due	October 8, 2020
Defendants Rebuttal Expert Report(s) Due	October 15, 2020
SEC Rebuttal Expert Report(s) Due	October 23, 2020
Deadline for Depositions of Experts	October 30, 2020
Dispositive Motion Cutoff	November 6, 2020
Exhibit and Witness Lists for Trial Due	January 4, 2021
Deposition Designations Due	January 4, 2021
Objections to Deposition Designations Due	January 11, 2021
Objections to Exhibit Lists Due	January 11, 2021
Counter Deposition Designations Due	January 18, 2021
Motions in Limine/Daubert Motions Due	January 18, 2021
Trial Begins	February 1, 2021

Respectfully submitted,

**SECURITIES AND EXCHANGE COMMISSION**

By its Attorneys,

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Dated: March 18, 2020

**Certificate of Service**

I, Deena R. Bernstein, certify that on March 18, 2021, the foregoing joint statement was filed electronically with the Court. The filing will be sent to the registered participants as identified on the Notice of Electronic Filing and may also be accessed through the Court's ECF system.

/s/ Deena R. Bernstein  
Deena R. Bernstein